

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

BRIDGETON LANDFILL, LLC	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	Case No. 4:18-cv-01800
MALLINCKRODT LLC, et al.	)	
	)	
Defendants.	)	

**MOTION TO FILE JOINT STATUS REPORT IN LIEU OF PROPOSED SCHEDULING  
PLAN UNDER SEAL**

Plaintiff Bridgeton Landfill, LLC (“Plaintiff”) respectfully requests the Court grant leave to file under seal. In support of the Motion, the Plaintiff states as follows:

1. The Joint Status Report filed concurrently with this motion discusses an ongoing mediation involving all parties involved in this pending litigation.
2. The Mediation Process Agreement incorporates a Mediation Confidentiality Agreement, which claims confidentiality over documents exchanged and matters discussed related to the mediation and any potential settlement.
3. As such, the Joint Status Report discusses matter that are confidential pursuant to the Mediation Confidentiality Agreement and the Mediation Process Agreement.

WHEREFORE, the Parties pray the Court permit leave to file their Joint Status Report In Lieu of Proposed Scheduling Plan under seal and such other and further relief as is just and proper in the premises.

Dated: September 18, 2020

LATHROP GPM LLP

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 18<sup>th</sup> day of September 2020, a true and accurate copy of the foregoing was served on all counsel of record via the U.S. District Court ECM/ECF system.

/s/ William G. Beck  
An Attorney for Plaintiff